ID-G-130082
C-3

EPA

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e. PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 I D G 1 3 0 0 8 2 11	12 1 7 0 3 2 4 17	18 C	19 S	20 3

Remarks

21 NPDES General Aquaculture permit administratively extended by EPA 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 4 69	70 3	71 F	72 N	73 74	75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
Billingsley Bay
916 Pioneer Road
Hagerman, ID 83332

Entry Time/Date: 09:56AM 3/24/2017
Permit Effective Date: 12/1/2007
Exit Time/Date: 12:00PM 3/24/2017
Permit Expiration Date: 11/30/2012

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Numbers
Peter Sturdivant
Owner
P: 208-309-2087
F: 208-788-9845

Other Facility Data (e.g., SIC, NAICS, and other descriptive information)
SIC = 0273 (Animal Aquaculture)
NAICS = 112511 (Animal Aquaculture)

Name, Address of Responsible Official/Title/Phone and Fax Number
Linda & Gary Lemmon
2775 South 1050 East
Hagerman, ID 83332
P: 208-837-4448 F: 208-837-4448

Contacted: [X] Yes [ ] No

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

X	Permit	X	Self-Monitoring Program		Pretreatment		MS4
X	Records/Reports		Compliance Schedule		Pollution Prevention		
X	Facility Site Review		Laboratory		Storm Water		
X	Effluent/Receiving Waters	X	Operations & Maintenance		Combined Sewer Overflow		
	Flow Measurement	X	Sludge Handling/Disposal		Sanitary Sewer Overflow		

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes / SEV Description

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Craig Thomas	IDEQ/TFRO/208-736-2190 & 208-736-2194	4/14/17
Tyler Fortunati, REHS	IDEQ/State Office/ 208-373-0140 / Fax 208-373-0576	4/14/17

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete

ICIS 4-25-17

STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

650 Addison Avenue West, Suite 110 • Twin Falls, Idaho 83301 • (208) 736-2190
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippets, Director

April 14, 2017

Peter Sturdivant
P.O. Box 968
Hailey, ID 83333

Re: Compliance Inspection at Billingsley Bay, Hagerman Idaho NPDES Permit No. IDG130082

Dear Mr. Sturdivant:

On March 24, 2017, Craig Thomas of the Department of Environmental Quality (DEQ) conducted a compliance inspection of the Billingsley Bay facility on behalf of EPA. The purpose of this inspection was to determine compliance with the Clean Water Act, specifically compliance with the facility's National Pollutant Discharge Elimination System (NPDES) Permit No. IDG130082.

DEQ appreciates the cooperation and assistance you provided during the inspection. A copy of the inspection report has been enclosed for reference. At the time of the inspection, no areas of concern were identified.

Please ensure all aspects of your operation are conducted in accordance with applicable federal, state, and local requirements.

The inspection report in its entirety has been submitted to EPA, which retains all rights to pursue enforcement actions to address these concerns and any other violations. If you have any questions regarding this matter, please contact Craig Thomas at craig.thomas@deq.idaho.gov or 208-736-2190 or alternatively Maria Lopez at Lopez.Maria@epa.gov or (208) 378-5616.

Sincerely,

Craig Thomas
Aquaculture Coordinator

CT:gl

Enclosure (1)

Idaho Department of Environmental Quality
AQUACULTURE FACILITY INSPECTION REPORT
NPDES Permit Number IDG130082

Effective: December 1, 2007. Expiration: November 30, 2012
NOI Submission: September 1, 2015

PURPOSE OF INSPECTION	Evaluate system compliance with NPDES permit and the Clean Water Act.
TYPE OF INSPECTION	**Announced Compliance Evaluation Inspection**
DATE(s) OF PREVIOUS NPDES INSPECTIONS	Date: **12/09/2011** Date: **06/27/2007**
PENDING OR CURRENT ENFORCEMENT ACTIONS **(review NOV and warning letters on file)**	1. **None were found**
PRIMARY FACILITY NAME	**Billingsley Bay**
OTHER NAME(S) USED FOR FACILITY	**N/A**
NPDES PERMIT #	**IDG130082**
FACILITY CONTACT	Name: **Linda Lemmon** Position: **Hatchery Technician** Phone Number: **208-539-1730** Fax Number: **208-837-4448** Email: **lemmon@wildblue.net**
FACILITY SIZE (annual fish production; affects frequency of monitoring requirements in parentheses). Confirm production and monitoring frequency during the inspection.	**<100,000 lbs. (semi-annual)**
INSPECTOR(s) AND AFFILIATION Craig Thomas	**Craig Thomas** **Regional Aquaculture Coordinator** **Idaho Department of Environmental Quality** **Twin Falls Regional Office**
DATE OF INSPECTION	Date: **03/24/2017** Arrival Time: **09:56** Departure Time: **12:00**

2017AH37

Photo of facility sign, if any, and facility

Google Earth Map—Facility Overview—See Exhibit B & C for complete facility overview, with GPS waypoints and digital Photographs.

DATE OF FINAL REPORT	Date: 4/14/17

ENTRY AND PERMIT CONDITIONS REVIEW

This was an announced inspection. Linda Lemmon was contacted on March 13, 2017, to schedule the March 24th inspection.

I arrived at the facility at 09:56 and met Mr. Sturdivant and Peter Sturdivant at the facility office. After introductory pleasantries, I presented my credentials and discussed the purpose of the visit prior to the inspection. Access to the facility was not denied.

Mr. Sturdivant is the owner and facility operator, Ms. Lemmon from Blind Canyon Aquaranch LLC. Manages the fish production and daily activities, except water quality monitoring which is conducted by Mr. Sturdivant.

Paperwork and document review commenced, followed by a tour of the facility. The inspection concluded at approximately 12:00 with an exit interview where any areas of concern were presented, and a review of what to expect from DEQ following the completion and submission of the inspection report to EPA. At the time of the inspection and paperwork review, no areas of concern were found.

OPENING CONFERENCE	
1. Explain the purpose of the inspection and how the inspection will proceed.	Remarks: **Completed**
2. Review the issuance and expiration dates of the facility's NPDES permit.	Remarks: **Completed**
3. [I.C.3.c.] Explain the NOI and the date of submission prior to the expiration date of the permit (June 3, 2012 – 180 days prior to expiration).	Remarks: **Completed**
4. Explain that the inspection will involve a review of the DMRs, QA Plan, BMP Plan, most recent NOI, Receiving Water Monitoring Report, & Annual Report.	Remarks: **Completed**
5. Explain that the inspection will involve a site tour/visit of the facility.	Remarks: **Completed**
6. Are all necessary personnel present for the inspection?	Remarks: **Yes**
7. Will any chemicals or hazardous chemicals be encountered during the site tour/visit?	Remarks: **No**
8. Does the permittee have any questions before proceeding with the inspection?	Remarks: **No**

PRELIMINARY QUESTIONS	
1. Obtain representative's name, position, and phone number.	Name: **Peter Sturdivant** Position: **Property Owner** Phone: **208-309-2087** Email: **peter@petersturdivant.com**
2. How long has the representative worked for the company?	**2 years**
3. How long has he/she held the position?	**2 years**
4. Other representative(s) present for the inspection.	Name: **Linda Lemmon** Position: **Hatchery Technician** Phone: **208-539-1730** Email: **lemmon@wildblue.net**

NOTICE OF INTENT (NOI)	
NOI Review: Show the interviewee the NOI, and ask him/her to review it for errors. If errors are found, ask him/her to correct the errors and initial the corrections. A new NOI should be submitted if several corrections are made.	
1. What is the date of the most recently submitted NOI?	**12/20/2011**
2. Is the NOI complete and current?	**Yes**
3. Have any structural changes been made to the facility recently?	**No**
4. Any structural changes anticipated? (Plan and Spec review required of DEQ, if so; see page 47; Part VI.I.2.)	**No**
FACILITY LOCATION, ETC. (see NOI)	Address: **916 Pioneer Rd.** **Hagerman, ID. 83332** Phone: **208-309-2087** Fax: **N/A** Email: **Peter@petersturdivant.com**
OWNER NAME	**Peter Sturdivant**
OWNER ADDRESS	Address: **P.O. Box 968** **Hailey, ID. 83333** Phone Number: **208-788-9845** Fax: **208-788-9845** E-mail: **Peter@petersturdivant.com**
OPERATOR NAME	**Peter Sturdivant**
OPERATOR ADDRESS	Address: **P.O. Box 968**

	Hailey, ID. 83333 Phone Number: **208-788-9845** Fax: **208-788-9845** E-mail: **Peter@petersturdivant.com**
PERMIT TRANSFERS 1. Is this a new operator?	**No**
If new, review the following: According to VII. I. "Transfers. Authorization to discharge under this permit may be automatically transferred to a new permittee on the date specified in the agreement only if: 1. The current permittee notifies the Director of the Office of Water and Watersheds at least 30 days in advance of the proposed transfer date; 2. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility and liability between them; and 3. The Director does not notify the existing permittee and the new permittees of its intent to revoke and reissue the authorization to discharge.	
2. Was EPA and DEQ notified in writing of the transfer?	**N/A**
LOCATION OF FACILITY Previous GPS: **Latitude: N 42° 50' 11.82"** **Longitude: W 114° 54' 4.92"** **Date: September 9, 2011**	GPS taken at entrance to facility: Latitude: **42.83887094** Longitude: **W -114.9004641** Date: **3/24/2017** Time: **12:01**
	Google Earth GPS at entrance to facility: Latitude: **N 42.838961** Longitude: **W -114.900498** Elevation: **2863 feet** Date: **06/08/2016 (satellite image date taken)**
AUTHORIZATION TO DISCHARGE	
1. Did you receive a letter authorizing you to discharge?	**Yes** — Mr. Sturdivant provided a copy of an email letter that was received from EPA authorizing the discharge.
2. "Addressee" on the authorization to discharge letter: 3. Is this correct?	Name: **Tsar Nicoulai – no longer in business** **No – Peter Sturdivant**
4. Do you have a copy of the permit?	**Yes**
5. Is the facility currently discharging?	**Yes**
6. Was the facility containing, growing or holding fish on December 1, 2007 (effective date of the permit)?	**Yes**
7. If not currently discharging, when do you expect to rear fish again at this facility?	**N/A**
8. [II.A.1. & 2. (p 10)]Do you plan to participate in Pollutant Trading?	**Not at this time**

PROHIBITED DISCHARGES	
Part II.B., Page 29. Review the prohibited discharges 1 & 2 (a-h) with the interviewee. **COMPLETED**	
1. Have you had any such prohibited discharges that you know of since December 1, 2007?	**No.**
2. Do you expect to have any difficulty prohibiting such discharges from this facility?	**No**
PROHIBITED PRACTICES	
Part II.C., Pages 29-30. Review the prohibited practices 1 - 2 with the interviewee. **COMPLETE**	
1. Have you or any other employee engaged in any of these prohibited practices that you know of since December 1, 2007?	**No**
2. Do you expect to have any difficulty prohibiting such practices at this facility?	**No**
DMR - FACILITY MONITORING REQUIREMENTS	
Part II.D., (see page 30-33). Ask to see the recent DMRs and raw data. Review to determine if the permittee is filling in the correct data (influent, effluent raw data, and effluent net). See page 30, II.D.2.b., for requirement when data are less than MDL. According to II. D., "The permittee shall monitor discharges from all outfalls authorized under the permit as specified in Tables 12 and 13..." (see pages 30-33) For frequency requirements, see footnote 16 of Table 12, and footnote 29 of Table 13 for OLSBs)	
1. When was the last monitoring event?	Mr. Sturdivant stated that the last monitoring event took place on 01/01/17.
2. Who conducted the monitoring?	Mr. Sturdivant
3. Is this the person who usually conducts the monitoring?	**Yes**
4. Who fills out the DMRs?	Mr. Sturdivant stated that he fills out the DMRs.
5. When was the most recent DMR submitted to EPA and DEQ?	Mr. Sturdivant stated that most recent DMR submitted to EPA and DEQ was 03/20/17.
6. [II.D.1.] Do you monitor discharges from all outfalls authorized under this permit as specified in Table 12 (p 31) (Raceways and FFSBs) and Table 13 (p 32) (OLSBs)?	**Yes**
7. [II.D.2.a.] Do you use methods that can achieve MDLs less than or equal to those specified in Table 15 (p 34)?	**Yes**
8. [II.D.2.b.] For purposes of reporting on the DMR, do you comply with Appendix D, 4?	**Yes**
9. Influent Water Sources	
a. How many influent sources?	Mr. Sturdivant stated only one influent source from Billingsley Cr. is available and used at the facility.
b. Are all influent sources monitored for flow?	**Yes**
c. Are all influent sources monitored for WQ parameters?	**Yes**
d. Are all influent sources combined into one sample to determine flow and/or WQ parameters?	**Yes**
10. Raceways and FFSBs Discharges [II.D.3] (Table 12, p 31)	
a. [II.D.3.a.] Timing: Are all influent and effluent samples and flow measurements taken on the same day?	**Yes**

b. [II.D.3.a] Timing: If your facility has multiple effluent discharge points and/or influent points, do you composite samples from all points proportionally to their respective flow?	**N/A**
c. [II.D.3.b.] Location: Are effluent samples from the effluent stream collected just prior to discharge into the receiving waters?	**Yes**
d. [II.D.3.b.] Location: If the effluent stream mixes with other flows, do you collect effluent samples from the effluent stream just prior to discharge into receiving waters?	**N/A**
e. [II.D.3.b.] Location: If the facility with raceways discharges to a FFSB(s), do you collect effluent samples from the FFSB(s) just prior to discharge into the receiving waters?	**Yes**
f. [II.D.3.c.] Small discharges: Does the facility have small discharges that comprise less than 1% of the total raceway flows?	**No**
g. [II.D.3.c.] Small discharges: Are the flows of these small discharges monitored at a minimum of once per year?	**N/A**
h. [Table 12, p 31, Footnote 17] What is the interval of discrete sampling for the composite sample? (The permit requires four or more discrete samples taken at one-half hour intervals or greater in a 24 hour period.)	Mr. Sturdivant stated that a sample is taken at least 30 minutes apart, four times throughout the 24 hour period.
i. [Table 12, p 31, Footnote 17] When sampling raceway discharge, is at least one sample taken during quiescent zone or raceway cleaning? ("at least ¼ of the samples")	**Yes**
If not, why not?	N/A
j. [Table 12, p 32, Footnote 17] What types of samples are taken for influent? (permittees with spring influents may elect to take grabs, page 32, footnote 17)	Mr. Sturdivant stated that composite samples are taken at the influent.
k. How and where is flow measured for the raceways? And by whom?	Mr. Sturdivant stated that flow measurement is taken using a ruler at the contracted rectangular weirs at the bottom of the raceways as they discharge into the FFSBs. West side is 4 feet, and east side is 10 feet.
l. [Table 12, p 31, Footnote 14] Is this flow measurement method one of those specified in Appendix E. Part I.A. (p 79)?	**Yes**
m. [Table 12, p 32, Footnote 18] Are all influent and effluent samples and flow measurements taken on the same day?	**Yes**
n. [Table 12, p 31, Footnote 15] Is flow measurement taken concurrently with each pollutant sampling, when applicable, once for every composite sample? Or is it taken on either the influent or effluent as long as the measurement at that location accurately reflects the discharge flow to the receiving water?	**Yes** — Mr. Sturdivant stated that the flow measurement is taken only one time on a sampling day, and he does a visual inspection for changes in water flow during water quality sampling day. Additional and multiple flow measurements of water flows are taken quarterly on sampling days.

	N/A
11. How is the flow measuring device calibrated? And by whom?	Mr. Sturdivant stated that Frank Erwin IDWR Water Master and Gary Lemmon calibrates the gauge and checks for leaks and levelness.
12. OLSBs Monitoring Measurements [II.D.4.]: NO OLSB	
a. [II.D.4.] Does the facility collect effluent samples from the effluent stream just prior to discharge into the receiving waters?	**No OLSB**
b. [Table 13, p 32, Footnote 25] Are OLSB influent and effluent samples collected during quiescent zone cleaning?	**N/A**
c. How and where is flow measured for the OLSBs? And by whom?	**N/A**
d. [Table 13, p 32, Footnote 27] Is the flow measurement one of those specified in Appendix E.I.A.?	**N/A**
e. [Table 13, p 33, Footnote 28] For OLSB effluent or influent, are flow measurements taken concurrently with pollutant sampling, when applicable? Or is it taken on either OLSB influent or effluent as long as the measurement at that location accurately reflects the discharge flow to the receiving water?	**N/A** **N/A**
f. [Table 13, p 33, Footnote 30] Does the facility monitor for composite samples? If so, does the composite sample represent 4 or more discrete samples taken at ½ hour intervals or greater in a 24-hour period? Do the composite samples represent multiple effluent discharge points and/or influent points as same day samples from all point proportionally to their respective flows?	**N/A** **N/A** **N/A**
g. How is the flow measuring device calibrated? And by whom?	**N/A**
h. [Table 12, p 31, Footnote 16] What is the monitoring frequency of the OLSBs?	**N/A**
i. [Table 12, p 31, Footnote 18] Are all influent and effluent samples and flow measurements taken on the same day?	**N/A**
j. [Table 12, p 32, Footnote 20] Does the facility monitor for temperature?	**N/A**
k. [Table 12, p 32, Footnote 21] Does the facility monitor for copper?	**N/A**
13. [Table 12, p 32, Footnote 19] Was net effluent load recorded on the DMR calculated correctly? (check a few DMRs; see Appendix D, page 75 for equations)	**N/A**
14. Are you aware of any recent violations of the permit limits? What was the limit that was exceeded? Date of the exceedance.	**No** **N/A**

15. Are the data reported properly on the DMRs?	**N/A**
16. Are DMR data consistent with analytical results?	**N/A**
RECEIVING WATER MONITORING	
Part II.E., (see pages 33-35). According to II.C.1., "All permittees with OLSB that discharge directly to receiving water must conduct receiving water monitoring for ammonia, pH, and temperature upstream from the outfall." And 2, "All facilities using chelated copper compounds or copper sulfate must monitor total recoverable copper and hardness immediately upstream of the outfall at least once in any quarter when these compounds are applied..." Ask to see the QA Plan which will describe where the samples are taken in the receiving stream.	
1. [II.E.1.] Does the facility have an OLSB discharging to a receiving stream? If so, are you monitoring receiving water for ammonia, pH, and temperature upstream from the outfall?	**No** N/A
2. [II.E.2.] Does the facility use chelated copper compounds or copper sulfate? If so, are you monitoring receiving water for total recoverable copper and hardness immediately upstream of the outfall in any quarter?	**No** **N/A**
3. [II.E.3.] Are receiving water samples grab samples and are they collected during the time when effluent composite samples are being collected for the same parameters?	**N/A**
4. [II.E.4.] Are receiving water samples analyzed using EPA approved methods capable of achieving method detection limits (MDLs) that are equivalent to or less than those listed in Table 15 (Permit, p 34)?	**N/A**
5. [II.E.5.]Are you submitting the results to EPA and DEQ with the DMRs?	**N/A**
6. [II.E.6.] Are receiving water monitoring results submitted to EPA with copies to DEQ with the DMRs for the month when the monitoring is conducted? Does the DMR report include all information required in Part V.E. and a summary and evaluation of the analytical results, including a short discussion of the accuracy and precision of the data, any problems with sample collection or analysis that may have affected the results, or what conditions existed at the time of the sample collection that may be relevant to how representative the data may be of the normal conditions at that site?	**N/A** N/A
7. [II.E.7.] Is quality assurance/quality control plans (QA/QC plans) for all the monitoring, documented in the QA Plan required under Part II.F (Quality Assurance Plan)?	**Yes**
QUALITY ASSURANCE PLAN (QA PLAN)	
Part II.F., (see page 35). According to II.F. "The permittee must develop a QA plan for all monitoring required by this permit. The plan must be developed and implemented within 60 days of coverage under this permit."	
1. [II.F.] Do you have a QA plan?	**Yes**
2. [II.F.] When did you submit the certification (Appendix F) that a plan has been developed and is being implemented?	The certificate date was submitted on 04/09/2008.
3. [II.F.1.] Is the QA Plan designed to assist in planning for the collection and analysis of effluent and receiving water samples in support of the permit and in explaining data anomalies when they occur?	**Yes**

4. [II.F.2.] During all sample collection and analysis activities, does the permittee use the EPA-approved quality assurance and quality control (QA/QC) and chain-of-custody procedures described in EPA/QA/R-5 and EPA/QA/G-5?	**Yes**
5. [II.F.2.] Is the QA Plan prepared in the format that is specified in EPA/QA/R-5 and EPA/QA/G-5?	**Yes**
6. [II.F.3.a)] Does the QA Plan include: details on the number of samples, type of sample containers, preservation of samples including temperature requirements, holding times, analytical methods, analytical detection and quantification limits for each parameter, type and number of quality assurance field samples, precision and accuracy requirements, sample preparation requirements, sample shipping methods, and laboratory data delivery requirements?	**Yes** If not, what is missing? **N/A**
7. [II.F.3.b)] Does the QA Plan include: description of flow measuring devices or methods used to measure influent and/or effluent flow at each point, calibration procedures, and calculations used to convert to flow units. If a permittee's facility has multiple effluent discharge points and/or influent points, it must describe its method of compositing samples from all points proportionally to their respective flows?	**Yes** If not, what is missing? **N/A**
8. [II.F.3.b.(1)] If you elected to take grab samples of influents, does the plan provide evidence of insignificant variability among influent sources?	**N/A**
9. [II.F.3.b.(2)] If you elected to not monitor small discharges that comprise less than 1% of the total raceway flows, does the plan provide justification that effluent quality of these discharges is the same as monitored discharges?	**N/A**
10. [II.F.3.c.] Does the QA Plan include a map(s) of sampling points, including receiving water sampling locations and justification for the choice of the sampling?	**Yes**
11. [II.F.3.c.] Does the QA Plan have a location of the small discharges that comprise less than 1% of the total raceway flows?	**N/A**
12. [II.F.3.d.] Does the QA Plan include qualifications and trainings of personnel?	**Yes**
13. [II.F.3.e.] Does the QA Plan include the laboratory name and telephone number?	**Yes**
14. [II.F.5.] Are copies of the QA Plan kept on site and made available to EPA and DEQ upon request? If lack of suitable storage area makes on-site storage impossible, is the QA Plan kept in the possession of staff whenever they are working on-site?	**Yes** Copies of the QA plan are kept in the vehicles.
15. Is facility following / using the QA Plan?	**Yes**

BEST MANAGEMENT PRACTICES PLAN (BMP PLAN)	
Part III (see page 36). According to Part III.C., the permittee must develop and implement a BMP Plan which meets the specific requirements listed in Part III.E.	
1. Do you have a BMP plan? If not on site, is it in the possession of staff when they are working on-site?	**Yes**
2. When did you submit the certification (Appendix F) that a plan has been developed?	The certificate date was submitted on 04/09/2008.
3. Chemical Storage a. ensure proper storage to prevent spills, b. implement procedures for proper containing, cleaning and disposing of spilled material.	 **Yes** **Yes**
4. Structural Maintenance a. routinely inspect rearing and holding units and waste collection containment to identify and promptly repair damage, How often? b. regularly conduct maintenance of rearing and holding units and waste collection and containment systems to ensure their proper function	 **Yes** Daily **Yes**
5. Training Requirements: a. Train personnel in spill prevention and clean-up and disposal of spilled materials. b. Train personnel on proper structural inspection and maintenance of rearing and holding units and waste collection and containment systems.	 **Yes** **Yes**
6. Operational Requirements: a. Water which is disinfected with chlorine or other chemicals must be treated before it is discharged to waters of the U.S. b. Treatment equipment used to control the discharge of floating, suspended or submerged matter must be cleaned and maintained at a frequency sufficient to prevent overflow or bypass of the treatment unit by floating, suspended, or submerged matter. c. Procedures must be implemented to prevent fish from entering quiescent zones, full-flow and off-line settling basins. Fish which have entered quiescent zones or basins must be removed as soon as practicable. d. All drugs and pesticides must be used in accordance with applicable label directions (FIFRA or FDA) e. Chelated copper compounds and copper sulfate, when used, must be applied to only one raceway at a time.	 **Yes** **Yes** **Yes** **Yes** Mr. Sturdivant stated that the facility does not use chelated copper compounds or copper sulfate.

f. Identify and implement procedures to collect, store, and dispose of wastes, such as biological wastes, in accordance with IDAPA §02.04.17 and IDAPA §58.01.02. Such wastes include fish mortalities and other processing solid wastes from aquaculture.	**Yes**
g. Implement procedures to control the release of transgenic or non-native fish or their diseases as specified in any permit(s) issued by the Idaho Department of Fish and Game for the importation, transportation, release or sale of such species, in accordance with IDAPA §13.01.10.100.	**Yes**
h. Implement procedures to eliminate the release of PCBs from any known sources in the facility, including paint, caulk, or feed	**Yes**
When was the BMP Plan reviewed within the past year (III.D.) and updated recently?	**Yes** — 07/01/2015, Mr. Sturdivant stated that the BMP plan has been updated and is reviewed every year in January — a BMP certification document was viewed.
AQUACULTURE SPECIFIC REPORTING REQUIREMENTS (Part IV., Page 38)	
A. Drug And Other Chemical Use And Reporting Requirements (see pages 38-39)	
1. Do you use drugs, pesticides or other chemicals?	**None, the facility only raises sturgeon.**
If yes, ask to see the Chemical Log Sheet. (see Appendix G, page 91)	**N/A**
2. Are records being maintained of all applications?	**N/A**
3. When an INAD or extralabel drug is used for the first time, you are required to report this orally and in writing to EPA and DEQ. Have you used INADs or plan to use INADs or extra label drugs? If so, have you written to EPA and DEQ that you have signed up to use an INAD or prescription? (page 88) Have you provided an oral report to EPA and DEQ of an INAD or prescription use? (page 87) Have you provided a written report to EPA and DEQ of an INAD or prescription use? (page 89)	**N/A**
B. Structural Failure (see IV.B., page 39) Remind the interviewee of this new requirement: Failure or damage to the facility must be reported to EPA and DEQ orally within 24 hours and in writing within five days when there is a resulting discharge of pollutants to waters of the U.S.	**Completed**

C. Spills of feed, drugs, pesticides or other chemicals (see IV.C., page 39) Remind the interviewee of this new requirement: The permittee must monitor and report to EPA and DEQ any spills that result in a discharge to waters of the United States; these must be reported orally within 24 hours and in writing within five days.	**Completed**
D. Annual Report of Operations (see IV.D., page 40) Remind the interviewee of this requirement: The permittee must prepare and submit an annual report of operations by January 20th of each year to EPA and DEQ.(see Appendix H)	**Completed**
1. Did you submit the last report as required?	**Yes** — Mr. Sturdivant stated that he had submitted the last report as required on 01/18/2017.
2. Is the annual report complete? (Check the report against the required elements on pages 95-96.)	**Yes**
Ask to see the annual logs of production. 3. Are the logs consistent with what is reported in the annual report?	**Yes**
4. Was the facility able to provide all the required paper documentation requested?	**Yes**
FACILITY PHYSICAL INSPECTION – SITE TOUR	
Objectives of the facility inspection include: identifying all discharges to the surface waters from the facility; observing and recording prohibited discharges or practices; and noting any problems. Many of these questions are subjective.	
1. Any excessive feed in the raceways?	**No**
2. Any excessive solids stirred up in raceways?	**No**
3. Are all the barrier dam boards in place and level?	**Yes**
4. Any excessive solids built up in quiescent zones?	**No**
5. Any excessive solids going over the dam boards.	**No**
6. Any fish observed in the quiescent zones?	**No**
Photo (s) of raceway(s) conditions above:	**See Exhibit C. Photograph 4, 6, 7**
DISCHARGES	
Photo (s) of raceway(s), tailrace, and/or full-flow settling basin discharges.	**See Exhibit C. Photograph 4-13**
Are there any unreported outfalls? (check observed against NOI)	**No**
If so, describe:	**N/A**
Photo (s) of receiving water(s), particularly documenting any of below:	**See Exhibit C. Photograph 10, 13**
1. Any floating solids or visible foam in other than trace amounts?	**No**
2. Any evidence of discharged sludge, grit or accumulated solid residues?	**No**
3. Any floating or suspended or submerged matter, including dead fish, in amounts causing nuisance or objectionable condition?	**No**
4. Location of the receiving water monitoring.	N/A
5. If the facility has an **OLSB(s)**, is it discharging?	**No**

Photo (s) of OLSB discharges:	**See Exhibit C. Photograph N/A**
RECEIVING WATERS	
Photo (s) of receiving water(s), particularly documenting any of the items below:	**See Exhibit C. See Exhibit C. Photograph 10, 13**
1. Any floating solids or visible foam in other than trace amounts?	**No**
2. Any evidence of discharged sludge, grit or accumulated solid residues?	**No**
3. Any floating or suspended or submerged matter, including dead fish, in amounts causing nuisance or objectionable condition?	**No**
FLOW MEASUREMENT DEVICE(S)	
1. Were flow measurements taken during inspection?	**No**
2. Location of flow measuring device for raceways:	Bottom of the tailrace before entering the FFSB
3. How are flow measurements taken?	Flow measurement is taken using a ruler at the contracted rectangular weirs at the bottom of the raceways as they discharge into the FFSBs. West side is 4 feet, and east side is 10 feet.
4. Location of flow measuring device for OLSBs:	**N/A**
Photo (s) of taking flow measurement:	**N/A**
WATER TEMPERTURE MEASUREMENT	
1. Influent water Temp.	**Did not sample**
2. Effluent water Temp.	**Did not sample**
SAMPLING LOCATION & SAMPLING PREPARATION	
1. Are influent sample locations adequate?	**Yes**
2. Are effluent sample locations adequate?	**Yes**
3. Are samples refrigerated / iced down after sampling?	**Yes**
4. Are samples iced down during transportation to contract Lab?	**Yes**
SOLIDS CONTAINMENT & STORAGE	
1. Is the solids disposal area adequate?	**Yes**
2. Removed solids prevented from reentry to navigable waters?	**Yes**
3. Does the facility land apply solids or irrigate with or apply wastewater?	**Yes,** onto nearby agricultural lands.
INSPECTION CONCLUSION DATA SHEET (ICDS) INFORMATION	
1. Did you observe deficiencies (potential violations) during the on-site inspection?	**No**
2. If so, did you communicate them to the facility during the inspection?	**N/A**
3. Did the facility or operator take any corrective actions	**N/A**
4. Did you provide general compliance assistance during the inspections?	**No**
5. Did you provide site-specific compliance assistance?	**No**

AREAS OF CONCERN	
1. No areas of concern were discovered during the on-site physical inspection or paperwork materials review.	
Other Issues: N/A	

Exhibit A. DEQ DMR Review

DEQ conducted a DMR review from January 2014 through February 2017. The following is a summary of that review:

1. Water Right Flow. The water right for Billingsley Bay is IDWR No. 36-7282 for 36 cfs; No. 36-7314B for 15 cfs; No. 36-7314C for 5 cfs; No. 36-7750B for 8.5 cfs for a total conditional use up to 64.5 cfs from January 01 to December 31 for fish propagation.

2. TSS & TP Concentration Data. DEQ determined that the TSS and TP concentration data complies with Appendix D of the existing permit. The TP and TSS Net Load appeared not to be violated during the record review.

Table 2
Effluent Limitations for Facilities in the Upper Snake Rock Watershed

Facility Name	Permit Number	Parameter	Limitations (lbs/day)	
			Average Monthly	Maximum Daily
Billingsley Bay Farm	IDG130082	Net TP	11.0	16.3
Billingsley Bay Farm *(cont.)*	IDG130082	Net TSS	1277.3	2426.8

3. Lab Data to DMR's.
DEQ reviewed the laboratory results from the laboratory in conjunction with what was reported in the DMRs and determined that no mistakes were made in transferring the data.

Exhibit B. Latitude/Longitude Waypoint Locations

The follow Google Earth map shows the photo waypoint locations where DEQ visited the facility during the site tour.

		Latitude	Longitude	Date/Time
WAYPOINT	177	42.835732	-114.9012262	3/24/2017 11:17
WAYPOINT	178	42.83624137	-114.9013013	3/24/2017 11:21
WAYPOINT	179	42.83665502	-114.9015169	3/24/2017 11:25
WAYPOINT	180	42.83685467	-114.90152	3/24/2017 11:29
WAYPOINT	181	42.836954	-114.9036565	3/24/2017 11:35
WAYPOINT	182	42.8371384	-114.9035552	3/24/2017 11:40
WAYPOINT	183	42.83887094	-114.9004641	3/24/2017 12:01

Exhibit C. Photographic Documentation

Table of Photographs:

Photograph 1 - Waypoint 183 - Entrance sign to Billingsley Bay, looking south.

Photograph 2 - Waypoint 177 - Influent water quality monitoring site just before gate valves at left of photo, looking east.

Photograph 3 - Waypoint 177 - Top of pre-settling pond before raceways, looking north.

Photograph 4 - Waypoint 178 - Head race with top of raceways flowing to the left, looking north.

Photograph 5 - Waypoint 179 - 4 foot rectangular weir into south FFSB, flow monitoring site, looking west.

Photograph 6 - Waypoint 179 - Bottom of raceways before 4 foot weir, looking east.

Photograph 7 - Waypoint 180 - 10 foot rectangular weir & flow monitoring spot for north FFSB, looking north.

Photograph 8 - Waypoint 180 - Overview of north FFSB, looking west.

Photograph 9 - Waypoint 181 - South FFSB discharge point, looking east.

Photograph 10 - Waypoint 181 - Discharge into irrigation ditch from south FFSB, looking west.

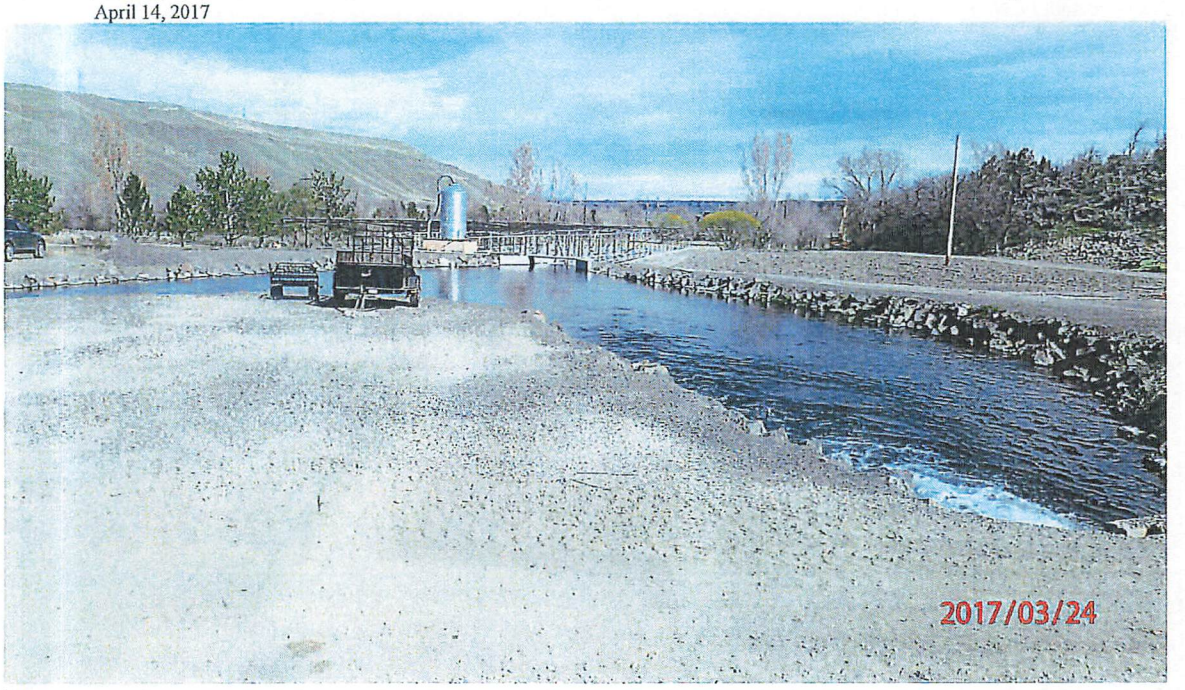
Photograph 11 - Waypoint 182 - North FFSB discharge point & water quality monitoring location, looking east.

Photograph 12 - Waypoint 182 - Overview of combined FFSB that has two discharge locations. At bottom of photo is the north discharge facing east.

Photograph 13 - Waypoint 182 - Overview of irrigation ditch that receives discharge water from Billingsley Bay, looking southwest.

Photograph 1

Photograph 2

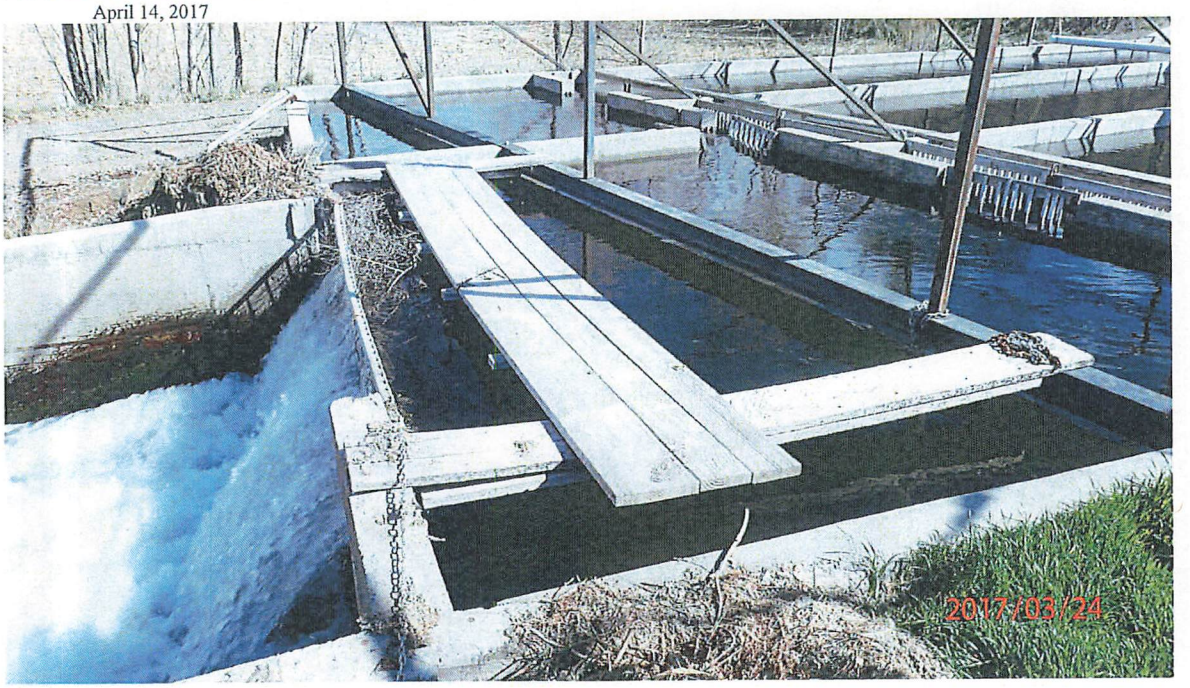


Photograph 3

Photograph 4

Photograph 5

Photograph 6

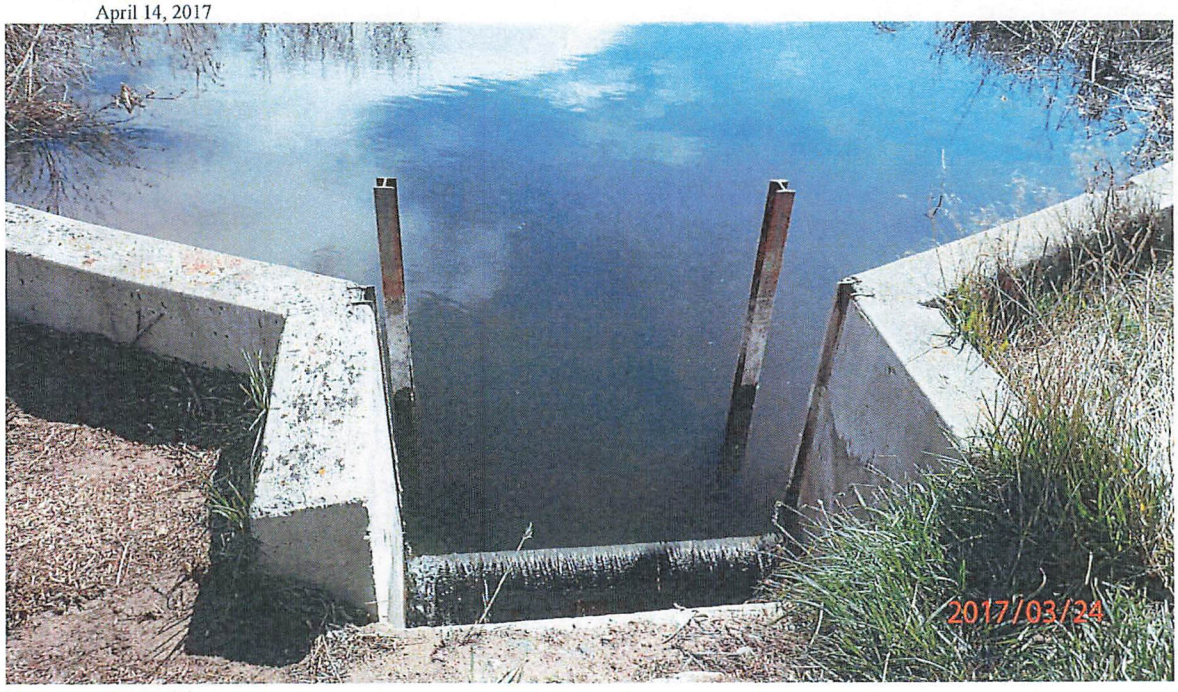


Photograph 7

Photograph 8

Photograph 9

Photograph 10



Photograph 11

Photograph 12

Photograph 13